

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as  
Administrators of the Estate of LOUIS  
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;  
BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of  
Prisons; LALITHA TRIVIKRAM;  
MAUREEN GAY; MARIESHA  
APOLLON; BLAIR CABELLOS; GENA  
FRASIER; WANDA BLOODSAW,

Defendants.

No. 2:24-cv-05618-TJS

**JURY TRIAL DEMANDED**

**PROPOSED ORDER**

AND NOW, this \_\_\_\_ day of June 2025, upon consideration of the Plaintiffs' Motion to Compel Discovery against YesCare, Corp., the Motion GRANTED. YesCare, Corp. is ordered to produce the following responsive documents:

- Any sentinel report or other review, investigation, or inquiry into the circumstances of the death of Louis Jung, Jr.
- All documents pertaining to the operation of the Pharmacist-Directed Diabetes-Initiative at PDP facilities between January 1, 2020 and December 31, 2023.
- Any audits of the provision of diabetes care by YesCare Corp., or its predecessor, Corizon, within Philadelphia Department of Prisons (PDP) facilities between January 1, 2018 and December 31, 2023.

- Any Performance Improvement Plans, Quality Assurance Plans, or other audits, reviews, assessments or evaluations of the provision of medical care within PDP facilities between January 1, 2018 and December 31, 2023.
- All medical records in possession of YesCare pertaining to admissions to and treatment within an outside medical facility such as a hospital that involve patients with Type 1 or Type 2 diabetes between January 1, 2020 and December 31, 2023.

BY THE COURT:

---